

STATE OF VERMONT

USDC - DVT
2:25-cv-111

SUPERIOR COURT
FRANKLIN DIVISION

CIVIL DIVISION
DOCKET NO.

GEICO A/S/O BONNIE WEBB,

Plaintiff,

vs.

RENEE BOLDUC,

Defendant.

Complaint

NOW COMES the Plaintiff, GEICO by and through their attorney, Daniel Orroth, Esq., in an action against Defendant, Renee Bolduc, and states the following:

1. The Plaintiff, GEICO, is a duly organized corporation doing business within the State of Vermont.
2. The Defendant, Renee Bolduc, was a resident of St. Albans, County of Franklin, State of Vermont.
3. At all times material hereto and in particular on or about December 1, 2023, Bonnie Webb, owned an automobile and maintained a contract of automobile insurance with the Plaintiff for that automobile.
4. On or about December 1, 2023, Bonnie Webb was operating a motor vehicle in the exercise of due care, at or near Route 78 in Alburgh Vermont, when the Defendant, Renee Bolduc, carelessly and/or negligently operated a motor vehicle so as to strike and damage the insured vehicle.

5. In following the traffic in front of her too close, the defendant violated Title 23 VSA section 1039.
6. As a result, in accordance with the terms and conditions of the contract of insurance, the Plaintiff made payment to or on behalf of its insured in the amount of \$11,467.80 for property damage expenses and in the amount of \$1,448.94 in substitute transportation expenses suffered by its insured. The Plaintiff now stands subrogated to the rights and causes of action of its insured, to the extent of said payments.

WHEREFORE, the Plaintiff demands judgment against the Defendant Renee Bolduc, in the amount of \$12,916.74 along with any other relief that this Honorable Court deems necessary and proper.

Respectfully submitted,
By Plaintiff's attorneys,

By: /s/ Daniel Orroth

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